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July 9, 2024

VIA ECF

Honorable Michael A. Hammer
United States District Court for the
District of New Jersey
Martin Luther King Courthouse
50 Walnut Street Room 2C
Newark, NJ 07101

Re: *United States v. Matthew Goettsche, et al.*, 19-CR-877 (CCC)
Proposed Modification of Pretrial Release Order

Dear Judge Hammer:

Please accept this letter in lieu of a more formal motion on behalf of Defendant Matthew Goettsche. We respectfully move to modify his bail conditions to allow him to attend a birthday party and dinner for his son at local venues on July 19, 2024. The specific time and location of the events shall be disclosed to and approved by Pretrial Services not less than 72 hours in advance. Mr. Goettsche will be accompanied by a third-party custodian at each event.

The Court's Order Setting Conditions of Release (dkt. 171) requires Mr. Goettsche to remain under home incarceration and that he "shall remain in the presence of a third-party custodian at all times unless otherwise approved by Pretrial Services." The Court previously approved other proposed consent bail modifications to these conditions (dkt. 187, 193, 225, 229, 252, 258, 270, 281, 290, 305, 311 and 323). The Court previously denied a motion to modify bail conditions (dkt. 268). The aforementioned proposed modification would not otherwise modify any other conditions as previously set forth or modified by this Court.

Pretrial Services and the government, through AUSA Anthony Torntore, have no objection to this proposed request. Thank you in advance.

Respectfully submitted,

/s/

Rodney Villazor, Esq.
CLARK SMITH VILLAZOR LLP

Hon. Michael A. Hammer

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